

WK:SP
F. #2023R00549

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

- against -

GUILLERMO CRUZ,

Defendant.

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I N D I C T M E N T

Cr. No. 23-CR-347
(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(A)(vi), 853(a) and 853(p);
T. 18, U.S.C., §§ 2 and 3551 et seq.)

Judge Eric R. Komitee
Magistrate Judge Peggy Kuo

THE GRAND JURY CHARGES:

DISTRIBUTION AND POSSESSION WITH
INTENT TO DISTRIBUTE FENTANYL

1. On or about July 31, 2023, within the Eastern District of New York and elsewhere, the defendant GUILLERMO CRUZ, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi); Title 18, United States Code, Sections 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such

offense to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offense; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, First Assistant U.S. Attorney
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

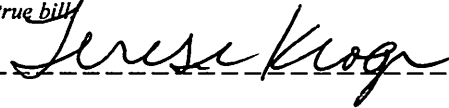
GUILLERMO CRUZ,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(A)(vi), 853(a) and 853(p);
T. 18, U.S.C., §§ 2 and 3551 et seq.)

A true bill



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Stephanie Pak, Assistant U.S. Attorney (718) 254-6064